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Attorneys for Defendant
12 | FEDERAL EXPRESS CORPORATION

13 |
UNITED STATES DISTRICT COURT
14 |
CENTRAL DISTRICT OF CALIFORNIA
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16 |

17 | SEYED KAZEROUNI, individually and on behalf of all others similarly situated,

Plaintiff,

v.

FEDERAL EXPRESS CORPORTATION., a Delaware Corporation

Defendant.

Case No. 8:15-cv-00060 CJC (ANx)
Honorable Judge Cormac J. Carney

DEFENDANT'S NOTICE OF MOTION AND MOTION TO DISMISS

[FRCP 12(b)(6)]

Date: April 27, 2015
Time: 1:30 p.m.
Place: Courtroom 9B_ __

Complaint Filed: January 14, 2015
Trial Date: None

TO   THE   UNITED   STATES   DISTRICT   COURT   FOR   THE   CENTRAL

DISTRICT OF CALIFORNIA AND TO PLAINTIFF AND HIS COUNSEL OF

RECORD:

1105041 (60-15108)

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FEDERAL EXPRESS
CORPORATION
2601 MAIN STREET
SUITE 340
IRVINE, CA 92614

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PLEASE TAKE NOTICE that on April 30, 2015, at 1:30 p.m., or as soon thereafter as counsel may be heard in Courtroom 9B of the United States District Court for the Central District of California, located at 312 North Spring Street, Los Angeles, California, 90012-47001, Defendant, Federal Express Corporation will and hereby does move this Court for dismissal of this Class Action under Federal Rule of Civil Procedure 12(b)(6).

This Motion is made following the conference of counsel pursuant to L.R. 7-3 which took place on March 10, 2015.

This Motion is based on this Notice of Motion and Motion, the Memorandum of Points and Authorities filed in support thereof, the papers, records and files in this action, and on such other oral and/or documentary evidence that may be presented at or before the hearing of this matter.

DATED: March13, 2015

FEDERAL EXPRESS
CORPORATION

/s/ Justin M. Ross
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DEFENDANT'S NOTICE OF MOTION AND MOTION TO DISMISS
Case No. 8:15-CV-00060-CJC-AN

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CERTIFICATE OF SERVICE

I am a resident of the State of Tennessee, over the age of eighteen years, and not a party to the within action. My business address is Federal Express Corporation, 3620 Hacks Cross Road, Building B, 3rd Floor, Memphis, TN 38125.

On March 13, 2015, I served the within document(s):

DEFENDANT'S NOTICE OF MOTION AND MOTION TO DISMISS

☐	by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below.
☒	via Court's ECF Filing System.
☐	by arranging with First Legal Support Attorney Service to personally deliver the document(s) listed above to the person(s) at the address(es) set forth below.
☐	by placing the document(s) listed above in a sealed envelope with delivery fees provided for, addressed as follows for collection by Federal Express for overnight delivery at Federal Express Corporation, 3620 Hacks Cross Road, Building B, 3rd Floor, Memphis, TN 38125, in accordance with Federal Express Corporation's ordinary business practices.

SEE ATTACHED SERVICE LIST

☐   *(State)* I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒   *(Federal)* I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on March 13, 2015 at Memphis, Tennessee.

<u>s/ Paula D. Cates</u>
Paula D. Cates

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1105041 (60-15108)

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DEFENDANT'S NOTICE OF MOTION AND MOTION TO DISMISS
Case No. 8:15-CV-00060-CJC-AN

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DEFENDANT'S NOTICE OF MOTION AND MOTION TO DISMISS
Case No. 8:15-CV-00060-CJC-AN